

THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW HAMPSHIRE

|                          |   |                           |
|--------------------------|---|---------------------------|
| _____                    | ) |                           |
| UNITED STATES OF AMERICA | ) |                           |
|                          | ) |                           |
| v.                       | ) | Case No. 1:21-CR-00021-SM |
|                          | ) |                           |
| RYDER WINEGAR            | ) |                           |
| _____                    | ) |                           |

ASSENTED-TO MOTION TO CONTINUE

NOW COMES the Defendant, Ryder Winegar, by and through counsel, and moves this Honorable Court to continue the Final Pretrial Conference and Jury Selection/Trial in this matter for a period of 45 to 60 days, as the Court's docket permits. In support of this, the Defendant states as follows:

1. This matter is scheduled for a Final Pretrial Conference on April 7, 2021, at 4:30 p.m., and for Jury Selection on April 20, 2021, at 9:30 a.m., with the Trial occurring during the two-week period following Jury Selection.
  2. The Government is still investigating the case and is going to provide the Defendant with additional discovery.
  3. The Defendant and counsel need additional time to either prepare for trial or reach a negotiated disposition.
  4. Counsel for the Defendant has contacted Assistant United States Attorney Charles Rombeau who assents to the relief requested in this motion.
  5. The Defendant will submit a Waiver of Speedy Trial following this motion.
- Defense counsel has consulted with the Defendant about this continuance request, the

Defendant understands that by seeking a continuance, he is waiving his constitutional and statutory rights to a speedy trial, and the Defendant has personally agreed to this continuance request. Defense counsel is this day mailing a copy of this motion to the Defendant along with a Waiver of Speedy Trial.

WHEREFORE, the Defendant prays for the following relief:

- A. To continue the Final Pretrial Conference and Jury Selection/Trial for a period of 45 to 60 days, as the Court's docket permits;
- B. For such other relief the Court deems equitable and just.

Respectfully submitted,

Ryder Winegar  
By his attorneys,

WILSON, BUSH & KEEFE, P.C.

Dated: March 11, 2021

/s/ Charles J. Keefe  
Charles J. Keefe  
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Assented-to Motion to Continue was this date forwarded through ECF to Charles L. Rombeau, Esquire, Assistant United States Attorney.

Dated: March 11, 2021

/s/ Charles J. Keefe  
Charles J. Keefe